



## Department of Energy

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Mr. James A. Saric, Remedial Project Director  
U.S. Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5th Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

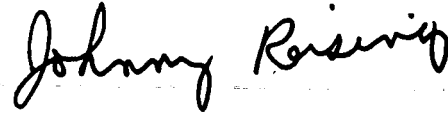
### SUBMITTAL OF RESPONSES TO COMMENTS ON THE ON-SITE DISPOSAL FACILITY POST-CLOSURE CARE AND INSPECTION PLAN

There were four outstanding comments on the On-Site Disposal Facility (OSDF) Post-Closure Care and Inspection (PCCI) Plan from the December 20, 1996, transmittal of Responses to Comments on the OSDF Final Design. Responses to these comments are enclosed. The Final PCCI Plan (Rev. 0) will be submitted with the Final OSDF Design. In addition to the changes resulting from the enclosed comments, the Final PCCI Plan will be revised to reflect the following:

- 1) The Operable Unit 3 (OU3) Record of Decision (ROD) for Final Remedial Action was signed on September 24, 1996.
- 2) The title of the OSDF Groundwater Monitoring Plan has been changed to OSDF Groundwater/Leak Detection and Leachate Monitoring Plan.
- 3) The OSDF Air Monitoring Plan has been incorporated into the Integrated Environmental Monitoring Plan and will no longer be a separate document.

If there are any questions regarding this submittal, please contact Rod Warner at (513) 684-3156.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Warner

Enclosures: As Stated

cc w/encs:

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## U. S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE "POST-CLOSURE CARE AND INSPECTION PLAN" FOR THE ON-SITE DISPOSAL FACILITY

1. Commenting Organization: U.S. EPA  
Section #: 1.2  
Original Comment #: 12

Page #: 1-1

Commentor: Saric  
Line #: 33

**Comment:** The text states that a description of the parties responsible for post-closure care and inspection (PCCI) and related plans is presented in sections following Section 1.2. However, no such description is presented. The PCCI plan should be revised to include a description of the parties responsible for PCCI and the plans related to it.

**Response:** The plans related to the PCCI Plan are presented in Section 1.3. A section will be added that provides a description of the parties responsible for post-closure care and inspection.

**Action:** Section 1.3 (Related Plans) has been renumbered Section 1.4. A new Section 1.3 has been added and is entitled "Responsible Parties."

2. **Commenting Organization:** U.S. EPA **Commentor:** Saric  
**Section #:** 5.3 **Page #:** 5-1 **Line #:** 35 and 36  
**Original Comment #:** 13

**Comment:** The text states that if a leak from the OSDF is detected, DOE will consult U.S. EPA and the Ohio Environmental Protection Agency (EPA) to determine what action is required. However, the text does not indicate how soon after a leak detection DOE will consult EPA and OEPA. The PCCI plan should be revised to state how soon after a leak detection DOE will consult EPA and OEPA to determine what action is required.

**Response:** Section 6.2 of the Groundwater/Leak Detection and Leachate Monitoring Plan (March 1997) details the procedure for notifying EPA and OEPA of a potential leak from the OSDF. This includes written notification to EPA and OEPA within 7 days and submittal of a preliminary assessment of the situation within 14 days. The Post-Closure Care Plan will be revised to reference the Groundwater/Leak Detection and Leachate Monitoring Plan.

**Action:** The last sentence of Section 5.3 has been revised to read, "If a leak is detected from the OSDF, DOE will consult with EPA and OEPA in accordance with the requirements established in the *OSDF Groundwater/Leak Detection and Leachate Monitoring Plan* for notifications and response actions."

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3. **Commenting Organization:** U.S. EPA **Commentor:** Saric  
**Section #:** 8.3 **Page #:** 8-2 **Line #:** 26 through 29  
**Original Comment #:** 14

**Comment:** The text states that the quarterly report submitted to EPA and OEPA will contain the results of contingency inspections. However, any severe damage to the OSDF or its surroundings might require immediate notification of EPA and OEPA. The PCCI plan should be revised to address the potential need for immediate notification of EPA and OEPA regarding contingency inspection results.

**Response:** DOE agrees that there may be instances where immediate notification of EPA and OEPA is necessary. This will be addressed in Section 8.3.

**Action:** The following sentence has been added to the end of the first paragraph in Section 8.3: "Events that have caused severe damage to the OSDF or that pose an immediate threat to human health or the environment will be immediately reported to EPA and OEPA."

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4. **Commenting Organization:** U.S. EPA **Commentor:** Saric  
**Section #:** 8.3 **Page #:** 8-3 **Line #:** 1  
**Original Comment #:** 15

**Comment:** The text refers to a preliminary inspection and assessment report to be prepared following a contingency inspection. However, the text does not specify the contents of this report or the schedule for submitting it to EPA and OEPA. The PCCI plan should be revised to specify the minimum content of the report and the schedule for submitting it to EPA and OEPA.

EPA Comments  
Post-Closure Care and Inspection Plan  
April 1997

**Response:** The preliminary inspection/assessment report referenced in Section 8.3 is identical to the report of each contingency inspection discussed earlier in the section. This will be clarified and the names will be made consistent.

**Action:** The second paragraph of Section 8.3 has been revised to read, "A preliminary inspection/assessment report of each contingency inspection triggered by such an unusual event will be submitted to the EPA and OEPA within 90 days of the initial report that damage or disruption has occurred at the FEMP OSDf site. At a minimum, this report will include...."